

REMARKS

The Official Action mailed December 16, 2009, has been received and its contents carefully noted. This response is filed within three months of the mailing date of the Official Action and therefore is believed to be timely without extension of time. Accordingly, the Applicant respectfully submits that this response is being timely filed.

The Applicant notes with appreciation the consideration of the Information Disclosure Statements filed on September 5, 2006; July 31, 2008; and November 12, 2009.

Claims 22-49 are pending in the present application, of which claims 22, 29, 36 and 43 are independent. Claims 22, 29, 36 and 43 have been amended to better recite the features of the present invention. Claims 29-35 have been withdrawn from consideration by the Examiner. Accordingly, claims 22-28 and 36-49 are currently elected, of which claims 22, 36 and 43 are independent. For the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

The Official Action rejects claims 22-49 as obvious based on U.S. Publication No. 2003/0170946 to Kondo. The Applicant respectfully submits that a *prima facie* case of obviousness cannot be maintained against the independent claims of the present application, as amended.

As stated in MPEP §§ 2142-2144.04, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some reason, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some reason to do so found either explicitly or implicitly in the references themselves or in the knowledge generally

available to one of ordinary skill in the art. "The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art." In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

The prior art, either alone or in combination, does not teach or suggest all the features of the independent claims, as amended. Independent claims 22, 29, 36 and 43 have been amended to recite "removing the release layer ... so that the plurality of thin film integrated circuits are fixed to the substrate at the connection region." These features are supported in the present specification, for example, by paragraphs [0006] and [0066], as filed. In the present specification, it is noted that the handling of a thin film integrated circuit was, prior to the present invention, difficult since the thin film integrated circuit has a tendency to move in an undesirable manner due to its extreme light weight (please see, e.g., paragraph [0004], as filed). In order to overcome the matter, the present application teaches selective formation of a release layer, and fixing the plurality of thin film integrated circuits to the substrate at the connection region even after removing the release layer. In other words, part of the plurality of thin film integrated circuits is fixed to the substrate even after removing the release layer. For the reasons provided below, Kondo does not teach or suggest the above-referenced features of the present invention.

Kondo may teach separation of a semiconductor element from a substrate using a sacrificial layer. However, Kondo discloses that "[w]hen all of the sacrificial layers 11 are etched in the fifth step, the functional layers 12 are separated from the substrate 10" (paragraph [0071]). From this disclosure, the Applicant respectfully submits that Kondo fails to teach that part of a semiconductor element is fixed to a substrate even after removing a sacrificial layer. Therefore, the Applicant respectfully submits that Kondo does not teach or suggest removing a release layer so that a plurality of thin film

integrated circuits are fixed to a substrate at a connection region in combination with the other recited claim elements.

Since Kondo does not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

At this opportunity, claims 22, 29, 26 and 43 have been amended to recite "after pasting the plurality of thin film integrated circuits to the first substratum," for clarity.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

The Commissioner is hereby authorized to charge fees under 37 C.F.R. §§ 1.16, 1.17, 1.20(a), 1.20(b), 1.20(c), and 1.20(d) (except the Issue Fee) which may be required now or hereafter, or credit any overpayment to Deposit Account No. 50-2280.

Respectfully submitted,



Eric J. Robinson
Reg. No. 38,285

Robinson Intellectual Property Law Office, P.C.
PMB 955
21010 Southbank Street
Potomac Falls, Virginia 20165
(571) 434-6789